



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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May 4, 2017

Mr. Todd Williams
Huntington Theater Company
264 Huntington Avenue
Boston, MA 02115

EVERETT
Transmittal No.: X273895
Application No.: NE-17-003
Class: SUBMIN
FMF No.: 582008
AIR QUALITY PLAN APPROVAL

Dear Mr. Williams:

The Massachusetts Department of Environmental Protection (MassDEP), Bureau of Air and Waste, has reviewed your Limited Plan Application (Application) listed above. This Application concerns the proposed construction and operation of woodworking equipment used to construct scenery for theater productions, which will be located at 48 Garden Street in Everett, Massachusetts (Facility).

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator (Permittee) must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Huntington Theater Company (the Permittee) is a theatrical production company that performs shows at several locations throughout the Boston area. The proposed Facility will house its scenery production operations that will include woodworking and paint spraying operations.

The Application addresses only the proposed woodworking operations, which include an equipment station for two table saws, a radial arm saw, a miter saw, a band saw, a shaper and a belt sander. The woodworking operation is designated EU1.

The woodworking operation will be equipped with a AQC Dust Collecting Systems Model Maxivibe No. AMV-140 dust collector with shaker cleaning. The envelope type filter dust collector will have a filter surface of 1140 square feet with an air handling capacity of 5500 actual cubic feet per minute at 72 degrees Fahrenheit (°F). The design pressure drop across the dust collector is 11.5 inches of water column. The pressure drop across the dust collector will be measured by a Magnehelic gauge. The air handling system consists of a Hartzell centrifugal fan with a power rating of 8.0 horsepower and a fan static pressure of 11.5 inches, water column.

MassDEP has determined that the emission limitations listed in Table 2 below represents Best Available Control Technology (BACT) for the woodworking operations.

With respect to paint spraying activities, the Permittee has elected to comply with the specific requirements of 310 CMR 7.03(5) through (7) in lieu of filing either a Comprehensive Plan Application (CPA) pursuant to 310 CMR 7.02(5)(a) or a Limited Plan Application (LPA) pursuant to 310 CMR 7.02(4)(a).

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1			
EU#	Description of Emission Unit	Design Capacity	Pollution Control Device (PCD)
EU1	Woodworking operations include table saws, radial arm saw, miter saw, band saw, shaper and belt sander	The combined air handling capacity for the various woodworking stations is 5500 actual cubic feet per minute at 72 ° F.	PCD-1: AQC Dust Collecting Systems Model No. Maxivibe AMV-1140

Table 1 Key:

EU# = Emission Unit Number
PCD = Pollution Control Device
°F = degrees Fahrenheit

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2:

Table 2			
EU#	Operational Limit	Air Contaminant	Emission Limits
EU1	Woodworking operations conducted not more than 2000 hours per 12-month rolling period.	PM/PM ₁₀ /PM _{2.5}	\leq 0.5 tons per month \leq 1.0 tons per rolling 12 month period

Table 2 Key:

EU# = Emission Unit Number

PM/PM₁₀/PM_{2.5} = Total Particulate Matter

\leq = less than or equal to

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, recordkeeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
EU1	1. The Permittee shall monitor the pressure differential across the dust collector on a continuous basis.
	2. The Permittee shall comply with the EU's standard operating and maintenance procedures (SOMP) that include daily, weekly, quarterly and annual maintenance procedures.
	3. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with EPA Reference Test Methods and regulation 310 CMR 7.13.

Table 3 Key:

EU# = Emission Unit Number

EPA = Environmental Protection Agency

CMR = Commonwealth of Massachusetts Regulation

Table 4	
EU#	Recordkeeping Requirements
EU1	1. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve-month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/eea/agencies/massdep/air/approvals/limited-emissions-record-keeping-and-reporting.html#WorkbookforReportingOn-SiteRecordKeeping .
	2. The Permittee shall maintain records of monitoring and testing as required by Table 3 including an inspection and maintenance logbook for the unit.
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date Standard Operating and Maintenance Procedure (SOMP) for the Emission Units approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s). The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s). At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	6. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	7. The Permittee shall make records required by this Plan Approval available to MassDEP and EPA personnel upon request.

Table 4 Key:

EU# = Emission Unit Number

EPA = Environmental Protection Agency

CMR = Commonwealth of Massachusetts Regulation

Table 5	
EU#	Reporting Requirements
EU1	1. The Permittee shall notify the Northeast Regional Office of MassDEP, Bureau of Air and Waste, (BAW), Permit Chief by telephone at 978-694-3200, email at nero.air@state.ma.us , fax at 978-694-3499, as soon as possible, but no later than three (3) business days after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to the Permit Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	2. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP’s request.
	4. The Permittee shall submit to MassDEP for approval a stack emission test protocol, at least 45 days prior to emission testing, for emission testing as defined in Table 3 ‘Monitoring and Testing Requirements’.
	5. The Permittee shall submit to MassDEP a final stack emission test results report, within 60 days after emission testing, for emission testing as defined in Table 3 ‘Monitoring and Testing Requirements’.

Table 5 Key:

EU# = Emission Unit Number

CMR = Commonwealth of Massachusetts

4. SPECIAL TERMS AND CONDITIONS

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
EU1	The Permittee shall have readily accessible at all times a minimum number of ten (10) replacement envelope filters for the subject unit.

Table 6 Key:

EU# = Emission Unit Number

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each Emission Unit that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The stack is equipped with a silencer at the stack outlet.
- C. The Permittee shall install and utilize an exhaust stack with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	Stack Height Above Ground (feet)	Stack Inside Exit Dimensions (feet)	Stack Gas Exit Velocity Range (feet per second)	Stack Gas Exit Temperature Range (°F)
EU1	16	1.67	50 to 60	68 to 72

Table 7 Key:

EU# = Emission Unit Number

°F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions or comments regarding this letter, please feel free to contact Joseph Su at (978) 694-3200 or joseph.su@state.ma.us.

Sincerely,

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Susan Ruch
Acting Permit Chief and
Deputy Regional Director
Bureau of Air and Waste

This final document copy is being provided to you electronically by the
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Joseph Su
Environmental Engineer

cc: Boston Public Health Commission, 1010 Massachusetts Ave., 6th Floor, Boston, MA 02118
Boston Fire Department, 115 Southhampton St, Boston MA 02118
David Gordon, 6 Minton Road, Billerica, MA 01821
MassDEP - Martha Bolis

ecc: MassDEP - NERO: Edward Braczyk, Martha Bolis
MassDEP - Boston: Yi Tian